

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

DANIEL B. KARRON

Defendant

07-cr-00541(PKC)
MOTION for
RECONSIDERATION

I, DANIEL B. KARRON(KARRON), the defendant, in this case, makes this explicit MOTION for RECONSIDERATION under Local Civil Rule 6.3.

1. It is admitted by both parties in their respective briefs and letters that the “Original Criminal Judgment” (ORIGINAL JUDGMENT) against Karron was superseded by an “Amended Criminal Judgment” (AMENDED JUDGMENT).
 - a. The existence of errors, corrected, uncorrected, ignored, expired, admitted or denied is immaterial to this action’s original central argument.
2. The Defendant’s central argument is the ORIGINAL JUDGMENT, once superseded and replaced by an AMENDED JUDGMENT, is nullified by all legal definitions and is without authority of any law or the courts. Therefore, the ORIGINAL JUDGMENT is void once nullified. It is dead.
3. Because the ORIGINAL JUDGMENT is void makes it eligible to be vacated by order of this court under Rule 60(b) without time limit by action of law.
4. Despite the uncontested fact that the ORIGINAL JUDGMENT is void, this ORIGINAL JUDGMENT is causing the Defendant an unconstitutional loss of property because it is blocking funds due the Defendant’s former attorney Ronald Rubinstein ESQ. These funds are being held in escrow by a title company in a recent real estate transaction involving the Defendant and the Defendant’s mother’s estate.
5. Therefore, this motion seeks this nullified and void ORIGINAL JUDGMENT vacated by this court. I need this dead judgment declared dead by this court. Please vacate this.
6. Consequently, by action of logic and law, the dependent Original Lien derived from the dead ORIGINAL JUDGMENT is void. Please set aside the “zombie” Original Lien.
7. The Defendant has a Constitutional right to vacate a dead judgment and a dead lien under the Procedural Due Process doctrine. This is analogous to the procedural due process right of the living to a government or state issued death certificate once a natural person passes.

- a. Because these funds are needed for Defendant's attack on the Defendant's criminal conviction, these funds are also protected under the defendant's constitutional right to vigorous and unconflicted counsel¹.
 - b. The issue of the validity or invalidity of the governments eight year very late pursue of an amended lien is immaterial and moot because the late amended lien was not recognized by the title company at the real estate transaction closing, only the dead original zombie lien.
8. Therefore, the only way the Defendant can gain access of these funds to relaunch the defendant's attack on the defendant's criminal judgment is to request of this court an order to set aside the zombie Original Lien, which also requires the court order the dead ORIGINAL JUDGMENT to be vacated.

SIGNATURE

Dated: Friday, November 10, 2017
New York, New York

Signed



Daniel B. KARRON
Defendant
Pro Se
e-Mail: drdbkarron@gmail.com
voice: (516) 515 1474
Fax: +1 516 234 7758
Care of Aldine Publications, LLC
1636 Third Avenue
Suite 300,
New York, New York 10128



¹ Luis v. United States, Oyez, <https://www.oyez.org/cases/2015/14-419> (last visited Nov 10, 2017). United States v. Monsanto, Oyez, <https://www.oyez.org/cases/1988/88-454> (last visited Nov 10, 2017). Charles P. Pierce, (March 31, 2016). "*The Supreme Court Just Did Something the Supreme Court Shouldn't Have to Do*, ESQUIRE "my every instinct tells me that the Supreme Court shouldn't have to [declare that the government cannot] pauperize a criminal defendant".

AFFIDAVIT OF SERVICE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

DANIEL B. KARRON
Defendant

07-cr-00541 (PKC)
AFFIRMATION OF SERVICE

I, DANIEL B KARRON, the Defendant declare under penalty of perjury that I served a copy of the attached list the names of the documents upon all other parties in this case by

BY EMAIL to: steve.kwok@skadden.com, Jessica.Greenwood@usdoj.gov
BY Receipted hand delivery, United States Court House, Criminal Intake 5th Floor
BY FAX; KPC Chambers: (212) 805-7949
BY United States Post Office

NOTICING LIST

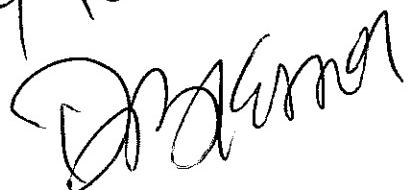
The Honorable Kevin P. Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 11D
New York, New York 10007
Chambers Phone: (212) 805-0262
Deputy Phone: (212) 805-0131
Fax: (212) 805-7949

Jessica Greenwood
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
United States Attorney's Office, SDNY
One Saint Andrew's Plaza
New York, NY 10007
212-637-2200
Voice Fax: 212-637-2527
Email: Jessica.Greenwood@usdoj.gov

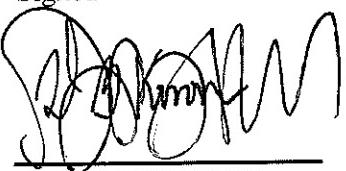
Chi T. Steve Kwok U.S. Attorney's Office, SDNY (St Andw's)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
One St. Andrew's Plaza
New York, NY 10007
Voice (212)637-2415
Fax: (212)637-2937
Email: steve.kwok@skadden.com

Mr. Chi T. Steve Kwok
Partner, Skadden, Arps, Slate, Meagher & Flom LLP
42/F, Edinburgh Tower, The Landmark
15 Queen's Road Central, Hong Kong
Voice: (852) 3740.4788
Fax:(852) 3910.4788
Email: steve.kwok@skadden.com

AFFIRMED to in New York, NY
Friday, November 10, 2017

14 Nov 2017


Signed



Daniel B. KARRON

Defendant

Pro Se

e-Mail: drdbkarron@gmail.com

voice: (516) 515 1474

Care of Aldine Publications, LLC
1636 Third Avenue
Suite 300,
New York, New York 10128

